

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

DONGGUAN SAIENCHUANGKE
TECHNOLOGY CO., LTD.,

CASE NO. 24-60865-CIV-DAMIAN

Plaintiff,

vs.

WHDPETSCares, KYM MLSMYXGS,
LIN&BABAY Direct, P&C-Direct, YZL123,
SHUHEYAN KSR, Granze Tech,
Zhangyueyuan, Hiliop Reusable WB Direct,
Furu Donghai

Defendants.

DONGGUAN SAIENCHUANGKE
TECHNOLOGY CO., LTD.,

Plaintiff,

vs.

The Individuals, Partnerships and
Unincorporated Associations Identified On
Schedule "A",

Defendants. /

NOTICE REGARDING MEDIATION

Plaintiff Dogguan Saien Chuangke Technology Co., Ltd. ("***Plaintiff***"), through its undersigned counsel, hereby provides the following notice regarding mediation in accordance with the Court's January 22, 2025 Order (ECF No. 164) and states as follows:

1. Plaintiff and counsel for 9 of the 10 appearing defendants (i.e., the Thornburg Defendants and the Liu Defendants)¹ have agreed to mediate this case using mediator Mark Stein,

¹ For purposes of this notice, the "Thornburg Defendants" include: Defendants WHDPETSCares (Defendant No. 2), YZL123 (Defendant No. 12), Granze Tech (Defendant No. 18), and Hiliop Reusable WB Direct (Defendant No. 45). For purposes of this notice, the "Liu Defendants" include Defendants KYM MLSMYXGS (Def. No. 3),

Esq. (1680 Michigan Avenue, Suite 700, Miami Beach, FL. 33139).

2. Mr. Stein has cleared conflicts and is agreeable to mediating this case.

3. Counsel for these parties also tentatively agreed to hold the mediation via video call on Monday, August 25, 2025 (which date works for all counsel of record while awaiting final confirmation from several of the Chinese-based parties).

4. In view of the Court's order (ECF No. 172) granting the withdrawal of counsel for Shenzhen Seven Stars Education Technology Co. Ltd., dba P&C-Direct (Defendant No. 9) ("**P&C**"), the undersigned reached out to P&C's former counsel and asked for P&C's contact information for purposes of scheduling mediation.

5. On February 9, 2025, a representative from P&D Direct contacted the undersigned writing:

"Dear Luca, P&C Direct is arranging for a new counsel for this matter which will require some time. Response regarding the appointment of the mediator will also be provided as soon as possible. Best Regards"

6. Inasmuch as P&C's representatives did not object to the use of mediator Mark Stein or to the proposed date, Plaintiff believes that the Court can move forward with entry of a scheduling order in the following form:

The mediation conference in this matter shall be held with Mark Stein on or before August 25, 2025 via video conference.

DATED: February 10, 2025

Respectfully submitted,

/s/ Luca L. Hickman, Esq.

Luca L. Hickman, Esq.

LIN&BABAY Direct (Def. No. 8), SHUHEYAN KSR (Def. No. 16), Zhangyueyuan (Def. No. 24) and Furu Donghai (Def. No. 48). For the Court's convenience, the enumeration of the Defendants used in this Objection is keyed to that used in Plaintiff's October 2, 2024 Status Report (ECF No. 125).

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Counsel for Plaintiff Dogguan Saienchuangke Technology Co., Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 10, 2025, a true and correct copy of this document was served to all counsel of records via CMF/ECF.

/s/ Luca L. Hickman, Esq.

Luca L. Hickman, Esq.

Florida Bar No. 118731